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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROTHSCHILD PATENT IMAGING
LLC,

Plaintiff,

v.

PLEX, INC.

Defendant.

Case No. 3:22-cv-02756-WHA

**JOINT STIPULATION TO
EXTEND DEADLINE TO
RESPOND TO THE COMPLAINT
BY 30 DAYS**

Complaint Filed: May 10, 2022
Current Deadline to Respond: July 1,
2022
Proposed New Deadline to Respond:
August 1, 2022

Hon. William Alsup

1 Pursuant to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 6-
2 1(a), Defendant Plex, Inc. (“Defendant”) and Plaintiff Rothschild Patent Imaging
3 LLC (“Plaintiff,” and together with Defendant, the “Parties”), by and through their
4 undersigned counsel of record, hereby stipulate to extend Defendant’s time to
5 respond to the filed complaint by 30 days, and for context, provide as follows:

6 WHEREAS, on May 10, 2022, Plaintiff filed its Complaint for a patent
7 infringement cause of action;

8 WHEREAS, on May 10, 2022, the Court issued an Initial Case Management
9 Scheduling Order under the Hon. Sallie Kim setting the Initial Case Management
10 Conference for August 8, 2022;

11 WHEREAS, on May 11, 2022, Plaintiff served Defendant with process of
12 the Complaint and Summons, making Defendant’s response to the Complaint due
13 June 1, 2022;

14 WHEREAS, on May 19, 2022, the Parties engaged in discussions and are
15 currently exploring whether potential settlement may resolve the case before
16 Defendant’s response is due;

17 WHEREAS, on May 24, 2022, all hearing dates then assigned were vacated
18 in view of reassignment of this case to the Hon. William Alsup;

19 WHEREAS, on May 26, 2022, the Parties filed a joint stipulation to an
20 extend the deadline to respond to the complaint by 30 days, which such stipulation
21 was granted by the Court;

22 WHEREAS, on June 1, 2022, the Court issued a Notice scheduling the Initial
23 Case Management Conference on August 11, 2022;

24 WHEREAS, the Parties have made significant progress in settlement
25 discussions;

26 WHEREAS, the Parties do not enter into this stipulation for the purpose of
27 delay;

1 WHEREAS, this extension of time to respond to the Complaint will not alter
2 the date of any event or any deadline already fixed by Court order;

3 WHEREAS, in view of the above, the Parties stipulate that good cause exists
4 to extend the time to respond to the Complaint;

5 IT IS SO STIPULATED.

6
7 Dated: July 1, 2022

Respectfully submitted,

8 KPPB LLP

9 By: /s/ Mark Yeh

10 Joel A. Kauth

11 Mark Yeh

12 Attorneys for Defendant Plex, Inc.

13 Dated: July 1, 2022

Respectfully submitted,

14 SML AVVOCATI P.C.

15 By: /s/ Stephen M. Lobbin

16 Stephen M. Lobbin

17 Attorney for Plaintiff Rothschild Patent
Imaging LLC

18 **ATTESTATION CLAUSE**

19 I, Mark Yeh, am the ECF User whose ID and password are being used to
20 file this JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO
21 THE COMPLAINT BY 30 DAYS. In compliance with Local Rule 5-1(h)(3), I
22 hereby attest that all other signatories listed, and on whose behalf the filing is
23 submitted, concur in the filing's content and have authorized the filing.
24

25 Dated: July 1, 2022

KPPB LLP

26 By: /s/ Mark Yeh

27 Mark Yeh

28 JOINT STIPULATION TO EXTEND DEADLINE 3
TO RESPOND TO THE COMPLAINT BY 30
DAYS

Case No. 3:22-cv-02756

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the following documents has been served upon all counsel of record on July 1, 2022, via the Court's ECF Filing System:

- Joint Stipulation to Extend Deadline to Respond to the Complaint by 30 Days.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 1, 2022, at Anaheim, California.

By: /s/ Mark Yeh

Mark Yeh